

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA : INFORMATION
- v. - : : S2 11 Cr. 416 (VM) 614

The United States Attorney charges:

1. In or about 2009, in the Southern District of New York and elsewhere, MARUFAL ISLAM, the defendant, willfully and knowingly did utter, use, attempt to use, possess, obtain, accept, and receive, and aid and abet the utterance, use, attempt to use, possession, obtainment, acceptance, and receipt of, an immigrant and nonimmigrant visa, permit, border crossing card, alien registration receipt card and other document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing it to be forged, counterfeited, altered, and falsely made, and to have been procured by means of a false claim and statement, and to have been otherwise procured by fraud and unlawfully obtained, to wit, ISLAM enabled and assisted aliens to fraudulently procure nonimmigrant visas by, among other things, providing them with information to be put into false job offer documentation.

(Title 18, United States Code, Sections 1546(a) & 2.)

COUNT TWO

The United States Attorney further charges:

2. From at least in or about 2008 through in or about August 2011, in the Southern District of New York and elsewhere, MARUFAL ISLAM, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii) and 1324(a)(1)(A)(iv) of Title 8, United States Code.

3. It was a part and an object of the conspiracy that MARUFAL ISLAM, the defendant, and others known and unknown, knowing and in reckless disregard of the fact that an alien has come to, entered, and remains in the United States in violation of law, would and did transport, and move and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, in violation of Section 1324(a)(1)(A)(ii) of Title 8, United States Code.

4. It was further a part and an object of the conspiracy that MARUFAL ISLAM, the defendant, and others known and unknown, knowing and in reckless disregard of the fact that an alien has come to, entered, and remains in the United States in violation of law, would and did conceal, harbor, and shield from detection, and attempt to conceal, harbor, and shield from

detection, such alien in any place, including a building and a means of transportation, in violation of Section 1324(a)(1)(A)(iii) of Title 8, United States Code.

5. It was further a part and an object of the conspiracy that MARUFAL ISLAM, the defendant, and others known and unknown, would and did encourage and induce an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence would be in violation of law, in violation of Section 1324(a)(1)(A)(iv) of Title 8, United States Code.

Overt Acts

6. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about March 2009, MARUFAL ISLAM, the defendant, provided his contact information to a co-conspirator not named herein ("CC-1") to be put into a fraudulent job offer that was to be used by a non-resident alien to obtain a fraudulent visa.

b. Throughout 2009, another co-conspirator not named herein ("CC-2") arranged for transportation for individuals to work as strippers in Manhattan.

(Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).)

FORFEITURE ALLEGATION

7. As a result of committing one or more of the offenses charged in Counts One and Two of this Information, MARUFAL ISLAM, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offenses of which the defendant is convicted; and any property real and personal that constitutes, or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offenses of which the defendant is convicted; or that is used to facilitate, or is intended to be used to facilitate, the commission of the offenses of which the defendant is convicted; and pursuant to 8 U.S.C. § 1324(b), ISLAM shall forfeit to the United States, any conveyance, including vessel, vehicle, or aircraft, that has been or was being used in the commission of one or more of the offenses, the gross proceeds of one or more of the offenses, and property traceable to such conveyance or proceeds.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value;

or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 8 U.S.C. § 1324(b), 18 U.S.C. § 982(b), and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 8, United States Code, Section 1324(b), 18, United States Code, Section 982, and Title 21, United States Code, Section 853.)

Preet Bharara
PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARUFAL ISLAM,

Defendant.

INFORMATION

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(8 U.S.C. § 1324(a)(1)(A)(v)(I);
18 U.S.C. §§ 2, 1546(a).)

PREET BHARARA

United States Attorney.

Filed Waiver of INDICTMENT + INFORMATION.

12/2/2011
AJC

- Defendant present with attorney Joshua Dratel.
- AUSA Dan Chavay present.
- CRT Rep present.
- Defendant withdraws plea of not guilty + enters plea of guilty to counts 1+2.
- Mag. J. Gorenstein recommends T. Marroo to accept guilty plea.
- Bail continued.

J. Gorenstein.
U.S.M.J.